

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GEM YIELD BAHAMAS LIMITED and GEM  
GLOBAL YIELD LLC SCS,

Petitioners,

vs.

MULLEN TECHNOLOGIES, INC. and MULLEN  
AUTOMOTIVE, INC.,

Respondents.

Case No. 1:24-cv-01120-KPF

Hon. Katherine Polk Failla

**NOTICE OF PETITIONERS' MOTION FOR SUMMARY JUDGMENT**

WILLKIE FARR & GALLAGHER LLP  
Jonathan A. Patchen (admitted *pro hac vice*)  
333 Bush Street  
San Francisco, California 94104  
(415) 858-7594  
(415) 858-7418  
jpatchen@willkie.com

Madeleine Tayer  
Justin Garbacz  
787 Seventh Avenue  
New York, New York 10019  
(212) 782-8914  
(212) 728-8801  
mtayer@willkie.com  
jgarbacz@willkie.com

*Attorneys for Petitioners GEM Yield Bahamas  
Limited and GEM Global Yield LLC SCS*

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**PLEASE TAKE NOTICE**, that upon Petitioners' Application to Confirm and Enter Judgment on Interim Measures Arbitration Award (Dkt. 1); the accompanying Memorandum of Law filed simultaneously herewith; the Joint Rule 56.1 Statement of Undisputed Materials Facts and the Joint Exhibit List filed simultaneously herewith; and upon all papers and proceedings heretofore had herein, Petitioners GEM Yield Bahamas Limited and GEM Global Yield LLC SCS (collectively, "GEM" or "Petitioners") respectfully move this Court for an Order: (1) pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment; (2) confirming the interim measures nondomestic arbitration award issued on January 24, 2024 (the "Interim Measures Order") by Arbitrator Mark C. Morril in an arbitration proceeding between Petitioners and Respondents Mullen Technologies, Inc. ("MTI") and Mullen Automotive, Inc. ("MAI" and together with MTI, "Mullen" or "Respondents"), entitled *GEM Yield Bahamas Limited and GEM Global Yield LLC SCS v. Mullen Technologies, Inc. and Mullen Automotive, Inc.*, AAA Case No. 01-21-0016- 7001 (the "Arbitration"); (2) directing Mullen's immediate compliance with the Interim Measures Order; (3) directing Mullen to file proof of compliance with the Interim Measures Order within one (1) day of such compliance; and (4) granting such other or additional relief that the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to the Court's Order dated April 8, 2024 (Dkt. 56), Respondents' response to Petitioners' Motion for Summary Judgment is due on or before May 6, 2024.

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Dated: April 22, 2024

WILLKIE FARR & GALLAGHER LLP

/s/ Jonathan A. Patchen

Jonathan A. Patchen (admitted pro hac vice)

333 Bush Street

San Francisco, California 94104

(415) 858-7594

(415) 858-7418

jpatchen@willkie.com

Madeleine Tayer

Justin Garbacz

787 Seventh Avenue

New York, New York 10019

(212) 728-8914

(212) 728-8801

mtayer@willkie.com

jgarbacz@willkie.com

*Attorneys for Petitioners GEM Yield Bahamas  
Limited and GEM Global Yield LLC SCS*

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 2024, I caused the foregoing Notice of Petitioners' Motion for Summary Judgment and the accompanying motion papers and supporting documents to be served on all registered parties via ECF, and on the following counsel for Respondents via email.

David K. Momborquette  
MCDERMOTT WILL & EMERY LLP  
One Vanderbilt Avenue  
New York, New York 10017  
(212) 547-5400  
[dmomborquette@mwe.com](mailto:dmomborquette@mwe.com)

William L. Miltner  
MILTNER & MENCK, APC  
402 West Broadway, Suite 960  
San Diego, California 92101  
(619) 615-5333  
[Bill@miltnerlaw.com](mailto:Bill@miltnerlaw.com)

Waleed Amer, Esq.  
Mark R. Basile, Esq.  
390 N. Broadway, Suite 140  
Jericho, New York 11753  
Tel.: (516) 455-1500  
Fax: (631) 498-0478  
Email: [waleed@thebasilelawfirm.com](mailto:waleed@thebasilelawfirm.com)  
[mark@thebasilelawfirm.com](mailto:mark@thebasilelawfirm.com)

/s/ Jonathan A. Patchen  
Jonathan A. Patchen